

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

BRANDON CALLIER,

Plaintiff,

V.

**JASCOTT ENTERPRISES, LLC,
JASCOTT INVESTMENTS, LLC, and,
JOHN DOES 1-4,**

Defendants.

CAUSE NO. 3:22-cv-00301-FM

**DECLARATION UNDER PENALTY OF PERJURY BY FARHAN SHARIAR
IN SUPPORT OF DEFENDANT JASCOTT INVESTMENT, LLC'S
OPPOSED MOTION FOR SUMMARY JUDGMENT**

I, Farhan Shariar, pursuant to 28 U.S. Code § 1746, declare under penalty of perjury, that the following facts are true and correct, to the best of my knowledge, information and belief:

1. “My name is Farhan Shariar, otherwise known for business purposes as Jack Dawson. I am employed as Operations Manager at Hello Tech Solutions Ltd., a registered Business Processing Outsourcing company based in Dhaka, Bangladesh, whose address is 229 PSC Convention Hall Rd, Dhaka 1216, Bangladesh.

2. I am over the age of 18, of sound mind and capable of understanding and making this Declaration.

3. I have personal knowledge of all of the facts and contentions stated herein, and do hereby declare and affirm that all of the facts and contentions stated herein are true and correct to the very best of my knowledge and information, and, if called as a witness, could appear and testify competently thereto.

4. Among the services Hello Tech provides is business-to-business lead generation through digital and web-based advertising.

5. Hello Tech does not cold-call or use automated dialing systems. We receive sales leads through social media from people who call us directly or from people we call directly after they apply for funding on a social media website.

6. Hello Tech has numerous entities that it uses for digital and web-based advertising, including Green Arrow Capital, which was used by Mr. Brandon Callier, to apply for a Business Loan online. (See attached).

A. Hello Tech d/b/a Green Arrow Capital.

7. I am familiar with Mr. Brandon Callier, who is listed in our database as having responded to our marketing on thirteen (13) different occasions between April 9, 2021, and July 5, 2022.

8. I spoke personally with Mr. Callier on two (2) of the thirteen (13) occasions he inquired and/or applied for a business loan.

9. On each of Mr. Callier's thirteen (13) inquiries, Mr. Callier represented to myself and my staff that he was shopping for a business loan on behalf of one of his numerous businesses: Aero Services, LLC; Aero Finance, LLC; BBA Corp; Vanity Nail Bar; or as the owner of a tax preparation service.

10. Each time Mr. Callier inquired and/or applied for a business loan, Mr. Callier provided his phone number as (915) 383-4604, and email address, callier74@gmail.com.

11. Each time Mr. Callier inquired and/or applied for a business loan, Mr. Callier affirmatively gave consent to receive telephone calls, texts and emails regarding lending offers from us, our affiliates or from third-party funding partners, which Mr. Callier requested be

communicated to his phone number, (915) 383-4604, or his email address, callier74@gmail.com.

12. Every consumer who makes an inquiry to Hello Tech is informed at the beginning of the discussion that consent to receiving promotional communications is not required as a condition of any loan approval or funding, and that the consumer may revoke this consent at any time.

13. The thirteen (13) inquiries made to Hello Tech by Mr. Callier on behalf of his various business entities were contemporaneously documented by Hello Tech, in our electronic data base, during the course of a regularly conducted business activity.

14. According to Hello Tech's contemporaneous electronic data base, the dates and purposes of Mr. Callier's other twelve (12) business inquiries were:

- a. On April 9, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a working capital loan for Fifteen Thousand Dollars (\$15,000) on behalf of his business BBA Corp, my records indicate.
- b. On June 12, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his business Aero Finance, LLC, my records state.
- c. On June 29, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire additional equipment and expand his tax preparation business, my records state.
- d. On August 9, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his tax preparation business, my records indicate.
- e. On August 11, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) working capital loan on behalf of his business, Aero Finance, LLC, an inquiry which I personally handled, my records state.
- f. On September 13, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Ten Thousand Dollar (\$10,000) loan to acquire equipment for his business, Aero Services, LLC, my records state.

- g. On October 12, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a loan for Ten Thousand Dollars (\$10,000) to acquire equipment for his business BBA Corp, my records indicate.
- h. On November 5, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty-Five Thousand Dollar (\$25,000) loan to acquire equipment for a tax preparation business, my records indicate.
- i. On December 7, 2021, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty Thousand Dollar (\$20,000) loan to acquire equipment for his business, Aero Services, LLC, my records state.
- j. On January 20, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a Twenty Thousand Dollar (\$20,000) loan for working capital on behalf of Aero Services, LLC, an inquiry which I personally handled, my records state.
- k. On June 28, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a Fifty Thousand Dollar (\$50,000) loan to acquire equipment for his business Vanity Nail Bar, my records indicate.
- l. On July 5, 2022, Mr. Callier contacted Hello Tech to inquire about obtaining a working capital loan for Fourteen Thousand Dollars (\$14,000) for his business BBA Corp, my records indicate.

B. Brandon Callier d/b/a Aero Services LLC.

15. Of Mr. Callier's thirteen (13) business loan inquiries made to Hello Tech, the business loan inquiry relevant to Jascott Investments, LLC, was made on April 2, 2022. This inquiry, forwarded to Jascott Investments, LLC, was in response to Hello Tech's internet marketing on behalf of "Green Arrow Capital." Green Arrow Capital is one of numerous doing business as ("dba") entities that Hello Tech utilizes. (See attached).

16. Callier's initial inquiry on April 2, 2022, consisted of completing and submitting a business loan application online, via Green Arrow Capital's website. (See attached). Specifically, Mr. Callier completed and submitted his inquiry for a business loan, by going to the "Apply Now" web page on Green Arrow Capital's website. (See attached). On the "Apply

Now” web page, Mr. Callier provided financial information about his business, “Aero Services LLC”, such as its “Monthly Revenue”, its “Time in business”, and the “Funding Amount” requested, all of which was requested, in order to “Apply for a Business Loan Online.”

17. At the bottom of the “Apply Now” web page, below the “Apply for a Business Loan Online”, a notice to consumers is set forth, which reads as follows:

“By clicking the Get Funded button above, **you consent to receive calls, texts, and e-mails** via automated technology or recorded messages to any number or email address you provide regarding offers and my account by or on behalf of Greenbox Capital and its affiliates and third-party funding partners. You understand that consent to promotional communications is not required as a condition of any approval or purchase and **may be revoked** at any time by emailing info@greenboxcapital.com. Message and data rates may apply. You can also apply for business funding by contacting us at 855.442.3423. All information provided to Greenbox Capital is subject to our privacy policy.”

(See attached) (emphasis added).

18. By completing and submitting his “Business Loan Online” application, Mr. Callier thus provided his consent “**to receive calls, texts, and e-mails.**”

19. In a follow-up phone call, on April 2, 2022, after submitting his “Business Loan Online” application, Mr. Callier represented to Hello Tech employee Max Williams (d/b/a Green Arrow Capital) that he was seeking a Sixty Thousand Dollar (\$60,000) loan to acquire equipment for Mr. Callier’s business, Aero Services LLC. In that follow-up phone call of April 2, 2022, Max Williams obtained from Mr. Callier additional information, such as whether Mr. Callier has a history of bankruptcy filings, or outstanding debt, the reason for the loan, and how soon the financing was needed. Hello Tech requested this financial information from Mr. Callier to determine which of its affiliates or third-party funding partners are best suited to offer the financial products and services requested by business loan applicants such as Mr. Callier.

20. In the follow-up phone call of April 2, 2022, as a matter of policy, Mr. Callier was

asked if he consented to telephone contact from third-party funding sources such as INVESTMENTS. In the follow-up phone call of April 2, 2022, Mr. Callier consented to telephone contact from third-party funding sources, and therefore Mr. Callier's business loan inquiry was sent to INVESTMENTS, because we thought INVESTMENTS was a great fit, and Mr. Callier's verbal interview and online business loan application indicated he met all of the requirements for a business loan from INVESTMENTS.

21. Mr. Callier at no time before, during or after the follow-up phone call of April 2, 2022:

- a. Informed us that his phone number of (915) 383-4604 was a residential phone number;
- b. Informed us that he was on a "Do-Not-Call Registry"
- c. Informed us that he was not seeking or applying for a business loan;
- d. Informed us that he was not going to close on a business loan; or
- e. Revoked his "consent to receive calls, texts, and e-mails" from us, or from third-party funding sources;

Further Declarant Sayeth Not

###

EXECUTED on 24th January, 2024.



Farhan Shariar,
Declarant

[HOME](#)
[TERM LOAN](#)
[LINE OF CREDIT](#)
[ABOUT US](#)
[CONTACT US](#)

[APPLY NOW](#)

Click Relax & Get Funded

Quick Funding

Within hours of approval

\$1 Billion+

Available across various industries

Flexible Payments

Automatic payments tailored to your business needs

Your Business Need Options. We've got different loans available for you.

Green Arrow Line of Credit

Receive a flexible credit line that can be used to effectively manage your cash flow, whether it's for purchasing inventory or covering payroll expenses. This revolving credit line grants you convenient access to cash precisely when you require it.

Our loan program offers amounts ranging from \$1K to \$100K, and it comes with a repayment term of 12 months. What sets it apart is that the repayment term starts after each withdrawal, ensuring flexibility for subsequent loan requests and repayments.

Flexible and easily accessible funds for operational needs.
Lines of credit with a maximum limit of \$100K.

[Learn More](#)

Green Arrow Term Loan

Make this loan option for funding strategic investments in your business, such as facility expansion, research, or marketing significant products. You can receive a lump sum of cash upfront, providing you with immediate funds. Additionally, once you have repaid half of the loan amount, you have the option to cash for additional funds if needed.

We provide loans with amounts ranging from \$1K to \$450K, and you have the flexibility to choose repayment terms of up to 24 months. We advise you to take this loan decision based on your specific business needs and repayment capabilities.

Cash and easily accessible funds for operational needs.
Lines of credit with a maximum limit of \$100K.

[Learn More](#)

Business Financing Solutions

Custom Financing Solutions for your small business

Asset Based Loans*

- Based on inventory assets
- Terms starting at \$50,000 up to \$100,000
- Terms ranging from 6 months to 12 months
- Repaid daily, weekly or monthly payments

[Find out more >>](#)

Line of Credit *

- Funds starting at \$5,000 to \$250,000
- Terms up to 12 months
- Repayment amount arranged anytime
- Monthly payments
- More

[Find out more >>](#)

Small Business Loan*

- Loans up to \$1 million
- Funding as fast as 24 hours
- Terms ranging from 7 months to 12 months
- Repayment daily or weekly payments
- More

[Find out more >>](#)

We Fund Businesses in Most Industries

See all industries >>

TRANSPORTATION

RESTAURANT

CONSTRUCTION

MEDICAL

AUTO SALES

RETAIL

LANDSCAPING

DENTAL

The perfect Combo of speed and service And its very easy to get started



Step 1. Complete The application

Our application is pretty simple. You can apply online or over the phone.

Step 2. Get a decision

Your dedicated Loan Advisor will review your options with you.

Step 3. Receive your funds

Complete the online checkout and receive your funds as soon as the same day.

Apply Online

[Get Started](#)

Give Us a Call

(847) 318-4266

Monday to Friday

9:30AM-7:30PM ET

Since 2018, we have emerged as a prominent financial institution in the credit space. Our primary focus is on providing small business loans which are designed to assist small and mid-sized business owners with their funding requirements. We specialize in securing capital and business development loans and addressing various financial needs that businesses may face.

Important Links

- About
- Services
- Rates
- Contact
- Support

Newsletter

[SIGN UP NOW](#)

© 2024 Green Arrow Finance. All rights reserved.

Website created by Green Arrow Finance.

[illegible]

[HOME](#)
[TERM LOAN](#)
[LINE OF CREDIT](#)
[ABOUT US](#)
[CONTACT US](#)

Flexible and convenient access to working capital.

Lines of credit up to \$100k.

[Apply Now](#)

Revolving

Lines of credit from \$25K - \$100K

12-month

Revolving term loans with auto withdrawal

Simple

Auto-monthly debit payments

What is a business line of credit and how does it work?

A business line of credit is a type of lending that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

Compared to a term loan, a business line of credit is typically used to cover recurring business expenses on a day-to-day basis. With Green Arrow, you can get your credit limit up to \$100k, so you can get what you need. This is how it works: a revolving business line of credit. To help you build your credit, we require your personal history in the business credit bureau.

Benefits of Green Arrow business line of credit

Only pay for what you borrow

Interest only on the amount you borrow. No interest on the unused portion of your credit limit.

Instant funding

Once approved, your funds are available within 24 hours. No need to wait for a loan disbursement.

Build business credit

By using your credit limit, you can build your business credit score. This helps you get better terms on future loans.

Business funding that moves at your speed.

[Get it Now](#)

Step 1: Complete the application.
Our streamlined application is designed to be completed in just a few minutes.

Step 2: Get a decision.
Your dedicated loan officer will review your application and give you a decision.

Step 3: Receive your funds.
Completed and approved, your funds are ready to use within 24 hours.

Are we a match? Check our business line of credit requirements.

625	1 Year	\$100k	Business
<small>Minimum credit score</small>	<small>Minimum term</small>	<small>Maximum amount</small>	<small>Business type</small>

FAQs: Green Arrow Business Line of Credit.

What is OnDeck Instant Funding?

Instant Funding is a fast and easy way for small business owners to access working capital to run their business. It's a type of credit that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

How does my line of credit payment work?

With an OnDeck Business Line of Credit, you can get your credit limit up to \$100k, so you can get what you need. This is how it works: a revolving business line of credit. To help you build your credit, we require your personal history in the business credit bureau.

Can I get a credit line increase?

There are many reasons why you might want to increase your credit limit. For example, you might want to increase your credit limit to help you cover your business expenses.

What is OnDeck Instant Funding?

Instant Funding is a fast and easy way for small business owners to access working capital to run their business. It's a type of credit that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

How much will it cost?

The cost of your line of credit will vary based on a number of factors, including your credit score and business credit history. We'll help you understand the costs involved.

When other small business loans can't get in addition to my line of credit?

Our "No Fee" feature is unique. It allows you to get your credit limit up to \$100k, so you can get what you need. This is how it works: a revolving business line of credit. To help you build your credit, we require your personal history in the business credit bureau.

How can I use my line of credit to build business credit?

By using your credit limit, you can build your business credit score. This helps you get better terms on future loans.

Will applying for an OnDeck Line of Credit affect my credit?

OnDeck uses a soft credit check to determine if you're eligible for a line of credit. This won't affect your credit score.

Learn more about business lines of credit.

- What are the types of business lines of credit?
- What's the difference between a business line of credit and a business credit card?
- What's the difference between a secured and an unsecured business line of credit?
- How to apply for a business line of credit.
- Things to know before opening a line of credit.
- What are some ways to use a business line of credit?
- When should a business consider a line of credit?

OnDeck Instant Funding is a fast and easy way for small business owners to access working capital to run their business. It's a type of credit that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

OnDeck Instant Funding is a fast and easy way for small business owners to access working capital to run their business. It's a type of credit that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

OnDeck Instant Funding is a fast and easy way for small business owners to access working capital to run their business. It's a type of credit that allows you to borrow funds as and when you need them. You're given a credit limit, and until it's used, there's no need to pay interest. You only pay interest on the amount you borrow.

OnDeck Instant Funding

Get your credit limit up to \$100k. No fee. No hidden costs. No need to wait for a loan disbursement.

[Apply Now](#)

Business Line of Credit

Get your credit limit up to \$100k. No fee. No hidden costs. No need to wait for a loan disbursement.

[Apply Now](#)



About us

Since 2019, we have emerged as a prominent financial institution in the United States. Our primary focus is on providing small business loans, which are designed to assist small and mid-sized businesses with their funding requirements. We specialize in delivering prompt and hassle-free working capital and addressing various financial needs that businesses may have.

What We Do

We believe that small businesses are the lifeblood of the U.S. economy, and historically have been underserved financially. Since our founding in 2019, we've been committed to making it efficient and convenient for small businesses to access financing online.

We know that a small business is more than just a credit score. That's why we pioneered the use of data analytics and digital technology to aggregate and analyze thousands of data points to assess the creditworthiness of small businesses rapidly and accurately.

We also know that small business owners don't have enough hours in the day as it is, and when they need funds, they need them right away. That's why we created a simple online application, backed by exceptional customer service — so business owners can get the funds they need, and back to running their businesses.

Our Core Principles

OnDeck supports and empowers small businesses with flexible financing solutions and world-class service. We're committed to:



The Best Customer Experience

Ensuring all aspects of a customer's OnDeck experience meet highest standards of excellence.



Truthful, transparent information

Providing our customers with complete information about our products so they can make informed decisions.



Responsible business financing

Building a sustainable and scalable model of financing that enables small businesses to thrive.



Respect for Our Customers

Ensuring all aspects of a customer's OnDeck experience meet highest standards of excellence.



Privacy and Data Security

Providing our customers with complete information about our products so they can make informed decisions.



Live by Green Arrow Values

Building a sustainable and scalable model of financing that enables small businesses to thrive.



Since 2019, we have emerged as a prominent financial institution in the United States. Our primary focus is on providing small business loans, which are designed to assist small and mid-sized businesses with their funding requirements. We specialize in delivering prompt and hassle-free working capital and addressing various financial needs that businesses may have.

Important Links

- [About](#)
- [Services](#)
- [Pricing](#)
- [Contact](#)
- [Support](#)

Newsletter



[HOME](#) [TERM LOAN](#) [LINE OF CREDIT](#) [ABOUT US](#) [CONTACT US](#)



[APPLY NOW](#)

Contact Us

Contact Info

100 William Street 7th Floor New York, NY 10038 United States
(347) 318-4246
info@greenarrowcapital.com

Fill out the form below and we will
contact you as soon as possible!

Send



Since 2019, we have emerged as a prominent financial institution in the United States. Our primary focus is on providing small business loans, which are designed to assist small and mid-sized businesses with their funding requirements. We specialize in delivering prompt and hassle-free working capital and addressing various financial needs that businesses may have.

Important Links

- [About](#)
- [Services](#)
- [Pricing](#)
- [Contact](#)
- [Support](#)

Newsletter

SUBSCRIBE

Apply Online

FILL OUT THE FORM BELOW TO START APPLYING FOR A BUSINESS LOAN ONLINE AND GET FUNDING YOU NEED IN AS LITTLE AS 24 HOURS. ONE OF OUR FUNDING ADVISORS WILL REACH OUT TO YOU SHORTLY TO FINISH YOUR APPLICATION, LEARN MORE ABOUT YOUR BUSINESS, AND DISCUSS YOUR FUNDING AND REPAYMENT OPTIONS. WE AIM TO RESPOND TO ALL APPLICANTS WITHIN ONE HOUR (DURING REGULAR BUSINESS HOURS).

Apply for a Business Loan Online

All fields marked by an asterisk (*) are mandatory.

Funding Amount	Monthly Revenue
<input type="text"/>	<input type="text"/>
Time in business	Company Name
<input type="text"/>	<input type="text"/>
First Name	Last Name
<input type="text"/>	<input type="text"/>
Email	Phone Number
<input type="text"/>	<input type="text"/>
City	Zip Code
<input type="text"/>	<input type="text"/>
Country	Industry
<input type="text"/>	<input type="text"/>

GET FUNDED*

* By clicking the Get Funded button above, you consent to receive calls, texts, and e-mails via automated technology or recorded messages to any number or email address you provide regarding offers and my account by or on behalf of Greenbox Capital and its affiliates and third-party funding partners. You understand that consent to promotional communications is not required as a condition of any approval or purchase and may be revoked at any time by emailing info@greenboxcapital.com. Messages and data rates may apply. You can also apply for business funding by contacting us at 855-342-3423. All information provided to Greenbox Capital is subject to our privacy policy.



Since 2019, we have emerged as a prominent financial institution in the United States. Our primary focus is on providing small business loans, which are designed to assist small and mid-sized businesses with their funding requirements. We specialize in delivering prompt and hassle-free working capital and addressing various financial needs that businesses may have.

Important Links

- About
- Services
- Pricing
- Contact
- Support

Newsletter

Your Name

Your Email

SUBSCRIBE